

Adam P. Segal, Esq., Nevada Bar No. 6120
Christopher M. Humes, Esq., Nevada Bar No. 12782
BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, Nevada 89106-4614
Telephone: (702) 382-2101
Facsimile: (702) 382-8135
Email: asegal@bhfs.com
chumes@bhfs.com

*Attorneys for Creditors, Trustees of the Construction Industry
and Laborers Joint Trust Funds*

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re:

SIX STAR CLEANING AND CARPET
SERVICES, INC.,

Debtor.

Case No. BK-S-13-18735-MKN

Chapter 7

**RESPONSE TO APPLICATION TO
EMPLOY PRAEMIA LAW, PLLC AS
SPECIAL LITIGATION COUNSEL
FOR LENARD SCHWARTZER,
CHAPTER 7 TRUSTEE (ECF NO. 313)**

Creditors, the Trustees of the Construction Industry and Laborers Joint Trust Funds (the “Trust Funds”), by and through their counsel of record, Adam P. Segal, Esq. and Christopher M. Humes, Esq., hereby file this Response to the Application to Employ Praemia Law, PLLC as Special Litigation Counsel For Lenard Schwartz, Chapter 7 Trustee (the “Application”) (ECF No. 313).

Recently, the Trust Funds objected to the Debtor’s continued efforts in aggressively litigating the case *Collins et al v. Laborers International Union of North America Local No 872 et al.*, 2:11-cv-00524-GMN-DJA, when the case has persisted for a decade. *See* (ECF No. 312). Now, the Trustee has filed the Application to employ Praemia Law to continue the above-referenced litigation.

The Trust Funds file this Response in order to reserve all rights to object to any disbursement of attorney’s fees and litigation costs from the estate, subject to the restrictions outlined in the Bankruptcy Code. The Trust Funds specifically note that the 50% contingency fee arrangement is

1 likely unreasonable, given the standard contingency fees in Nevada, and the amount of work likely
2 remaining in the above-referenced litigation.

3 Based on the foregoing, the Trust Funds also respectfully request that they have 5 business
4 days to respond to any application to compensate Special Litigation Counsel, should the Court
5 decide to grant the instant Application.

6 Dated: May 11, 2021.

BROWNSTEIN HYATT FARBER SCHRECK, LLP

7 /s/ Christopher M. Humes

8 Adam P. Segal, Esq., Nevada Bar No. 6120

9 Christopher M. Humes, Esq., Nevada Bar No. 12782

10 100 North City Parkway, Suite 1600

11 Las Vegas, Nevada 89106-4614

12 Telephone: (702) 382-2101

13 Facsimile: (702) 382-8135

14 *Attorneys for Creditors, Trustees of the Construction*
15 *Industry and Laborers Joint Trust Funds*

BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, Nevada 89106-4614
(702) 382-2101

CERTIFICATE OF SERVICE

I certify that I am an employee of Brownstein Hyatt Farber Schreck, LLP and that on May 11, 2021, I served a true copy of the foregoing **RESPONSE TO APPLICATION TO EMPLOY PRAEMIA LAW, PLLC AS SPECIAL LITIGATION COUNSEL FOR LENARD SCHWARTZER, CHAPTER 7 TRUSTEE (ECF NO. 313) via CM/ECF System and E-Service** upon:

Dan M. Winder
3507 W. Charleston Blvd.
Las Vegas, NV 89102
winderdandocket@aol.com
Attorney for Debtor, Six Star Cleaning and Carpet Services, Inc.

Jacob L. Houmand, Esq.,
Houmand Law Firm LTD.
9205 W. Russell Rd., Bldg 3, Suite 240
Las Vegas, NV 89148
jhoumand@houmandlaw.com
Attorney for Trustee, Lenard Schwartzer

U.S. Trustee
300 Las Vegas Blvd., So. Suite 4300
Las Vegas, NV 89101

☒ b. **BY U.S. MAIL** upon:

Abingdon Business Capital
900 East Hamilton Ave., Suite 100
Campbell, CA 95008

Allied Collection Services
Acct No 2467868-1
3080 S. Durango Dr., Suite 208
Las Vegas, NV 89117

CENTURY LINK
Acct No 309584889
P.O. BOX 2961
Phoenix, AZ 85062

Clark County Assessor's Office
Attn Bankruptcy Clerk

BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, Nevada 89106-4614
(702) 382-2101

1 500 S Grand Central Pkwy
Las Vegas NV 89155

2 Cox Communications
3 Acct No 0018610088739103
4 PO Box 53262
Phoenix, AZ 85072

5 Dept Employment, Training & Rehab
6 Employment Security Division
500 East Third St
7 Carson City, NV 89703-0030

8 Dept. of Employment, Training & Rehab
9 Acct No 260055
Employment Security Division
10 500 East Third St.
Las Vegas, NV 89173

11 Dept. of Taxation
12 Acct No 9125
2550 Paseo Verde Pkwy. #180
13 Henderson, NV 89074

14 Eagle Graphic Systems, Inc. dba Signs Now
6290 S. Pecos Rd. Suite 600
15 Las Vegas, NV 89120

16 Financial Corporation
Acct No 1997505-1
17 PO Box 20350
Austin, TX 78720

18 H&E Equipment
19 Acct No 1027612
11100 Mead Road #200
20 Baton Rouge, LA 70816

21 Internal Revenue Services
22 Acct No 2792
PO Box 1485566
23 Cincinnati, OH 45250

24 Moneytree
Acct No SF000337
25 PO Box 58363
Seattle, WA 98138

26 NCO Financial Systems
27 Acct No 9103

28

BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, Nevada 89106-4614
(702) 382-2101

1 507 Prudential Road
Horsham, PA 19044

2 Nevada Department of Taxation
3 Bankruptcy Section
4 555 E. Washington #1300
Las Vegas NV 89101

5 Nevada Energy
6 Acct No 3000272011519154285
7 PO Box 30086
Reno, NV 89520

8 Nvenergy
9 C/O Credit Bureau Central
Po Box 29299
Las Vegas, NV 89126

10 Perini Building Company
11 Acct No mccarrant3
12 5871 Spencer Street
Las Vegas, NV 89119

13 Rapid Cash
14 Acct No 0050-P-001631086
15 3611 North Ridge Road
Wichita, KS 67205

16 Signs Now
17 Acct No sixstar
6290 S. Pecos Rd. #600
Las Vegas, NV 89120

18 Southwest Linen Company
19 Acct No 8315
20 6335 Sunset Corporate Dr.
Las Vegas, NV 89120

21 Staples
22 Acct No 8315
23 PO Box 689020
Des Moines, IA 50368

24 Sunbelt Rentals
25 Acct No 528139
PO Box 409211
Atlanta, GA 30384

26 Sundance Plaza LLC
27 Acct No 3530301

28

6725 Via Austi Parkway #380
Las Vegas, NV 89119

Sunset Business Park, LLC
Acct No A-13-678669
625 S. Eighth St.
Las Vegas, NV 89101

Tower Group Companies
Acct No wcn0001529
PO Box 2474
Eagle, ID 83616

United Temps
Acct No sixstar
1550 South Indiana #300
Chicago, IL 60605

US Bank N.A.
Bankruptcy Department
PO BOX 5229
Cincinnati, Ohio 45201-5229

US Bank National Assoc
Acct No 0249
PO Box 5227
Cincinnati Ohio 45202

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Ebony Davis

An Employee of Brownstein Hyatt Farber Schreck, LLP